

Message

From: Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]
Sent: 11/20/2018 8:45:05 PM
To: Patefield, Scott [Patefield.Scott@epa.gov]
Subject: Utah regs info
Attachments: OG Rules UT and Fed.docx; Utah O&G Air PBR Compliance Checklist.dotx

Hi Scott, this came in during the summer when I was out of the office on inspections and other travel for an extended period of time, and I never got a chance to digest.

Ex. 5 Deliberative Process (DP)

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If in preparing for the meeting Monday you figure out what might be needed down the road, please let me know.

Thanks,
Joe

Joe Wilwerding

USEPA Region 8, Office of Enforcement, Compliance & Environmental Justice
1595 Wynkoop Street, Denver, CO 80202-1129
(303) 312-6729, wilwerding.joseph@epa.gov

From: Brian Speer <bspeer@utah.gov>
Sent: Monday, July 16, 2018 11:22 AM
To: jrandolph@utah.gov <jrandolph@utah.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>
Subject: Re: time to chat about Utah O&G regs today?

I'm not really sure what the intent is for this summary - which may affect the level of detail desired, particularly if the summary was intended for sources that meet particular parameters. However, I have attached two summaries I wrote that you may wish to compare with.

"OG Rules UT and Fed.docx" will give you a look at a summary that is slightly more rule-like in language
"Utah O&G Air PBR Compliance Checklist.dotx" will give you a summary that is written for Y/N answers, as if using as an inspection template

Both of these summaries are mostly complete, though I believe I may have left a couple records requirements out of the Compliance Checklist.

Here are a few comments I can offer after looking at the spreadsheet you provided:

1. The small source exemption in R307-401-9 exempts sources from the requirement to obtain an AO, but does not exempt them from other area source rules, including the R307-500 series;
2. All O&G sources (under State jurisdiction) must be registered per R307-505, except sources that have an AO (we have combined the sources with AOs with the database for PBR sources);
3. Sources subject to emissions controls per R307-506 or 507 are also subject to 508 (VOC Control Devices) and 509 (LDAR);
4. All sources regardless of other exemptions are subject to the natural gas engine requirements of R307-510, the visible emissions requirements of R307-201, and the emission inventory requirements of R307-150-9.

You're welcome to send any other questions my way if you like.

Best regards,

Brian Speer | Environmental Scientist

Phone: 801.536.4194



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On Wed, Jul 11, 2018 at 8:02 AM, Joseph Randolph <jrandolph@utah.gov> wrote:

Brain - can you please take a look at this and see if he has summarized correctly. I am in training for two days.

----- Forwarded message -----

From: **Wilwerding, Joseph** <Wilwerding.Joseph@epa.gov>

Date: Wed, Jul 11, 2018 at 7:58 AM

Subject: RE: time to chat about Utah O&G regs today?

To: "jrandolph@utah.gov" <jrandolph@utah.gov>

Thanks Joe. When you get a chance, could you take a gander at the attached and see if I've summarized correctly?

Good luck out there,

Joe

Joe Wilwerding

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From: Joseph Randolph [<mailto:jrandolph@utah.gov>]

Sent: Tuesday, July 10, 2018 9:04 PM

To: Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: Re: time to chat about Utah O&G regs today?

Joe:

Sorry out on stack test today. I have training next two days. I will send you update on KM sites tomorrow in am.

On Tue, Jul 10, 2018 at 8:57 AM, Wilwerding, Joseph <Wilwerding.Joseph@epa.gov> wrote:

Hi Joe, do you have a half hour you can spare? Trying to get some thoughts down. Thanks,

Joe

Joe Wilwerding

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